

# PUBLIC SUBMISSION

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Draft NUREG : Revision 1 of Subsequent License Renewal Guidance Documents, and Supplement 1 to Associated Technical Basis Document

**Comment On:** NRC-2023-0096-0001

Draft NUREG: Revision to Subsequent License Renewal Guidance Documents, and Supplement to Associated Technical Bases Document

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Comment on FR Doc # 2023-14577

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## General Comment

XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping

XI.M43 should be deleted because the NRC staff has not identified a sufficient technical basis to include this aging management program in the SLR GALL.

NUREG 2221 S1 cites no technical basis as to why this program is necessary.

NUREG 2191 page XI-289 cites insufficient operating experience to justify the program. It only states: 10 Operating Experience: OE shows that pipes with CFRP repairs could be degraded. It is 12 necessary for the applicant to evaluate both plant-specific and nuclear industry OE and to 13 modify its AMP accordingly. The following example of industry experience may be of 14 significance to an applicant's program:

15 In October 2021, a carbon fiber wrap installed on the inner diameter of a circulating water 16 return piping was found to be degraded. A section of the wrap was completely missing from 17 the pipe wall and found to have relocated to the metallic screens. The carbon fiber wrap was 18 installed due to corrosion to ensure adequate operating margin to prevent future leakage 19 and/or rupture. With sections of the wrap missing the circulating water pipe would be 20 susceptible to continued corrosion.

The is only one OE cited with absolutely no details so I can independently verify its applicability. I would have the following questions:

1. Where did this happen? What plant?
2. Is there a reference report? It is not cited in the references.
3. The carbon fiber wrap was "found to be degraded". How was it degraded? Was it aging related or improper installation?
4. Was the carbon fiber wrap intended to be a permanent repair? If temporary repair, it should not require aging management.
5. M43 is also for buried piping systems. How does this single OE of an inner diameter carbon fiber wrap

inform aging management on the external piping surfaces for buried conditions?

6. Is this the only OE available? Why is one OE driving an entire industry implement this program?

See attachment for text changes.

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## **Attachments**

XI M43 HIGH- DENSITY POLYETHYLENE (HDPE) PIPING AND CARBON FIBER REINFORCED POLYMER (CFRP) REPAIRED PIPING 2 Comment - Comments

## **XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping**

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Note: Proposed changes to text are indicated by ***bold italicized text***.

<b>NUREG 2191 Volume 2 Revision 1 Draft</b>	<b>Mark up of text</b>	<b>Basis for comment</b>
	Delete pages XI-279 to XI-290	XI.M43 should be deleted because the NRC staff has not identified a sufficient technical basis to include this aging management program in the SLR GALL. NUREG 2221 S1 cites no technical basis as to why this program is necessary. NUREG 2191 page XI-289 cites insufficient operating experience to justify the program.